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October 28, 2022

VIA ECF

Hon. Denise L. Cote
United States District Court Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse,
500 Pearl Street
New York, NY 10007-1312

Re: *Iraq Telecom Ltd. v. IBL Bank S.A.L.*, Civil Action No. 21-cv-10940 (DLC)

Dear Judge Cote:

We are counsel to Petitioner Iraq Telecom Limited (“**Iraq Telecom**”) in the above-referenced action against Respondent IBL Bank S.A.L. (“**IBL**”). Pursuant to Federal Rule of Civil Procedure 5.2 and Rule 8.B. of Your Honor’s Individual Rules of Practice, Iraq Telecom respectfully submits this letter-motion requesting an order to file under seal its Reply Post-Remand Memorandum in Further Support of its Motion to Confirm Attachment and in Opposition to IBL’s Cross Motion to Vacate Attachment, and its Declaration of Dr. Paul G. Morcos. After filing this letter-motion, Iraq Telecom will publicly file its reply brief and reply declaration with proposed redactions and file under seal a copy of its unredacted reply brief and unredacted declaration with the proposed redactions highlighted in yellow.

Your Honor previously granted IBL’s letter-motion to file its Opening Post-Remand Memorandum of Law Concerning the Attachment Amount and supporting declarations under seal because those documents contain financial information that IBL claims deserves confidential status. *See* Dkt. 151. In an abundance of caution, and without taking a position about IBL’s level of interest in sealing its financial information, Iraq Telecom respectfully requests that this Court likewise grant its motion to file an unredacted version of its reply brief and declaration under seal because it quotes and references much of the same information IBL deems confidential and that Your Honor found “good cause” to redact. *Id.*

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We appreciate the Court's consideration.

Respectfully submitted,



Kevin S. Reed

Cc: All counsel (via ECF)